

From: [Gary Moore](#)
To: rbennett@tceq.state.tx.us
Subject: Fw: Falcon Refinery - FYI
Date: 06/01/2011 11:13 AM

FYI. I think this is a doable thing if they can get a permit.

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----- Forwarded by Gary Moore/R6/USEPA/US on 06/01/2011 10:58 AM -----

From: "Halasz, Stephen (Austin,TX-US)" <SHalasz@trcsolutions.com>
To: Gary Moore/R6/USEPA/US@EPA
Cc: Richard Bergner <rbergner@rflaw.net>
Date: 06/01/2011 10:47 AM
Subject: Falcon Refinery

Gary,

I discussed the conversation that you and I had with Mr. Bergner this morning. To prevent the accumulating rainfall in numerous tanks, Mr. Bergner approved the transfer of all liquid waste into Tank 30 the large 200,000 bbl tank. As tanks become empty they will be cleaned based on the addendum work plan and then either repaired or razed.

We would then like to treat the waste in Tank 30 likely with carbon and dispose of the water via a Land Application Permit through either the TCEQ or the RRC.

Unless you object to the transfer of fluids we will begin emptying tank 27 into tank 30 on Monday. Would you prefer that we obtain a Land Application Permit through the TCEQ or the RRC. Refinery waste would go through the TCEQ, however all that is left in the tanks is sludge and rainwater and without being refined crude oil tanks are under the jurisdiction of the RRC. I've completed applications with both agencies in the past year. Please let us know.

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